

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DIGITAL MEDIA SOLUTIONS, LLC)	CASE NO. 1:19-cv-145
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	MAGISTRATE JUDGE
)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO, LLC <i>et</i>)	
<i>al.</i> ,)	
)	
Defendants.)	

DECLARATION OF WILLIAM A. TURBAY

William A. Turbay hereby declares under penalty of perjury that the following is true and correct:

1. I am a resident of the State of Nevada.
2. I make the within declaration from my own personal knowledge, and I am competent to so testify.
3. I am the Manager of Save the Art Institute of Las Vegas, Limited.
4. In early March 2019, Save the Art Institute of Las Vegas, Limited entered into negotiations with the Receiver to acquire the Art Institute of Las Vegas ("Ai Las Vegas").
5. We are prepared to execute a Managed Service Agreement and a Transaction Service Agreement along with an MOU with the Receiver for Ai Las Vegas.

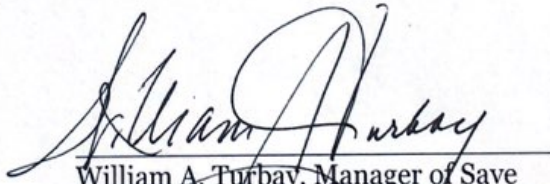
6. Pursuant to those negotiations, on March 7, 2019, I spoke with Timothy Ballard, an agent of Ai Las Vegas's landlord, Tech Park 6, LLC ("Tech Park"). It is my understanding that Mr. Ballard is a principal at Buchanan Street Partners, Inc., which owns Tech Park.

7. During my conversation with Mr. Ballard, I offered, on behalf of Save the Art Institute of Las Vegas, Limited and assuming its deal with the Receiver is approved by the Court, to assume Ai Las Vegas's lease in full, pay the rent arrearage (excluding interest, penalties, late fees, and attorney fees) over a 24-month period.

8. Pursuant to our discussions with Mr. Ballard, we were informed that our interest in assuming the lease was not acceptable.

9. Should the landlord be unwilling to allow Save the Art Institute of Las Vegas, Limited to assume Ai Las Vegas's lease or, in the alternative, to negotiate a new lease agreement, then Save the Art Institute of Las Vegas, Limited cannot close any deal with the Receiver to acquire Ai Las Vegas.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief. Executed the 9th day of March, 2019 in Las Vegas, Nevada.


William A. Turbay, Manager of Save
the Art Institute of Las Vegas, Limited